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Attorneys for Plaintiff
 ELECTRONICS FOR IMAGING, INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

ELECTRONICS FOR IMAGING, INC., a
 Delaware corporation,

Plaintiff,

vs.

JAN R. COYLE, an individual, and KOLBET
 LABS, a Nevada sole proprietorship,

Defendant.

Case No. C 01-4853 MJJ and Consolidated
 Case No. C 05-0619 MJJ

**STIPULATION AND ~~PROPOSED~~ ORDER
 TO FILE DOCUMENTS UNDER SEAL**

Judge: Hon. Martin J. Jenkins
 Hearing: November 1, 2005
 Time: 9:30 a.m.
 Courtroom: 11, 19th Floor

1 In order to protect Defendants Jan R. Coyle's and Kolbet Labs' privacy and the confidentiality
2 of their personal and financial information, Plaintiff and Defendants request permission to file certain
3 documents, which apply to a declaration filed in support of the hearing on November 1, 2005, under
4 seal in conjunction with its Motion for Sanctions. The relevant documents are marked
5 "CONFIDENTIAL" pursuant to the Court's April 4, 2005 Protective Order entered in this case. A
6 copy of the Protective Order is attached hereto as Exhibit A. Pursuant to Civil Local Rules 7-11 and
7 79-5(d) Plaintiff therefore requests permission to file under seal the following document and exhibits:

8 1. Exhibit C to the Declaration of William C. Rooklidge ("Rooklidge Decl."), a copy of
9 the 1997 Confidential Disclosure Agreement Between Jan R. Coyle and Gradco (Japan) Ltd. a
10 corporation of Japan and Gradco (USA) Inc. a corporation of California. EFI received this letter from
11 Defendants on January 16, 2004 in response to Plaintiff's First Set of Requests for Production, and
12 Defendants designated the document "CONFIDENTIAL" under this Court's April 4, 2005 Protective
13 Order.

14 2. Exhibit D to the Rooklidge Declaration, a copy of a letter dated April 16, 1998 from
15 Newton Lee to Martin Tash and Bernard Bressler on Gradco (USA) Inc. letterhead. EFI received this
16 letter from Defendants on January 16, 2004 in response to Plaintiff's First Set of Requests for
17 Production, and Defendants designated the document "CONFIDENTIAL" under this Court's April 4,
18 2005 Protective Order.

19 3. Exhibit E to the Rooklidge Declaration, a copy of a January 26, 2000 fax message from
20 Newton Lee to Terry Hashimoto with attached "descriptive materials" from Dan Kolbet and Dr. Bill
21 Avery disclosing the Coyle Technology. EFI received this fax and attachment from Defendants on
22 January 16, 2004 in response to Plaintiff's First Set of Requests for Production, and Defendants
23 designated the document "CONFIDENTIAL" under this Court's April 4, 2005 Protective Order.

24 4. Exhibit F to the Rooklidge Declaration, a copy of a May 27, 1998 letter from Newton
25 Lee to Martin Tash and Bernard Bressler on Gradco (USA) Inc. letterhead. EFI received this letter
26 from Defendants on January 16, 2004 in response to Plaintiff's First Set of Requests for Production,
27
28

1 and Defendants designated the document "CONFIDENTIAL" under this Court's April 4, 2005
2 Protective Order.

3 5. Exhibit H to the Rooklidge declaration, a copy of a July 14, 2000 OEM Agreement
4 entered into between Artifex Software, Inc. and Jan R. Coyle. The agreement was received pursuant to
5 discovery requests in this case, and Defendants designated the document "CONFIDENTIAL" under
6 this Court's April 4, 2005 Protective Order.

7
8 IT IS SO STIPULATED by the undersigned counsel.

9 Dated: September 23, 2005

Respectfully submitted,

10 HOWREY LLP

11
12 By: /s/
13 William C. Rooklidge
14 Attorneys for Plaintiff
ELECTRONICS FOR IMAGING, INC.

15 SANTORO, DRIGGS, WALCH, KEARNEY,
16 JOHNSON & THOMPSON

17
18 By: /s/
19 James D. Boyle
20 Attorneys for JAN R. COYLE AND
21 KOLBET LABS

~~[PROPOSED]~~ ORDER

The Court hereby ORDERS that Plaintiff and Defendants' Miscellaneous Administrative Request is GRANTED to protect Defendant Jan R. Coyle's privacy and the confidentiality of his financial information and for court convenience. The Clerk of the Court shall file under seal relevant portions of the Declaration of William C. Rooklidge in Support of EFI's Motion for Sanctions including Exhibit C, Exhibit D, Exhibit E, Exhibit F and Exhibit H.

IT IS SO ORDERED.

DATED: September, 262005

BY THE COURT,

By: _____


Honorable Martin J. Jenkins
United States District Court

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.:
 COUNTY OF ORANGE)

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 2020 Main Street, Suite 1000, Irvine, California 92614.

On September 23, 2005, I served on the interested parties in said action the within:

STIPULATION AND [PROPOSED] ORDER TO FILE DOCUMENTS UNDER SEAL

by electronically forwarding the above documents in Adobe Acrobat format to the below recipients:

James D. Boyle, Esq.
 Santoro, Driggs, Walch, Kearney, Johnson & Thompson
 400 South Fourth Street, Third Floor
 Las Vegas, NV 89101
 E-mail: jboyle@nevadafirm.com

James Tatum
 Santoro, Driggs, Walch, Kearney, Johnson & Thompson
 400 South Fourth Street, Third Floor
 Las Vegas, NV 89101
 E-mail: jtatum@nevadafirm.com

☒ (E-MAIL) I caused the foregoing document to be served by electronic transmission to each interested party at the e-mail addresses shown as stated above.

I declare under penalty of perjury that I am employed in the office of a member of the bar of this Court at whose direction the service was made and that the foregoing is true and correct.

Executed on September 23, 2005, at Irvine, California.

Serap Karaman-Stothers

 (Type or print name)

/s/

 (Signature)